

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ENG BOCK CHIA, RUI GUI WU, YUE MING LIN,  
GRACE WU, CINDY LIN, XIN QIANG YU, GUI  
XIANG DONG, CHIN KOK HING, WAI HO NG,  
JIANWEI XU, and WONG KAM FOONG,

Plaintiffs,

- against -

520 ASIAN RESTAURANT CORP. d/b/a CHEF YU,  
5127 RESTAURANT CORP. d/b/a GINGER'S,  
TUNG SHENG YEH, STEVEN C.J. TANG, ALICE  
TANG, KUAN YOKE AKOON aka "WINNIE," TEO  
SU JIN, BENNY CHEONG

Defendants.

Docket No.: 17-CV-5885(GHW)

**NOTICE OF MOTION**  
**IN LIMINE**

**PLEASE TAKE NOTICE** that the undersigned shall move this Court, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, 10007, before the Honorable Gregory H. Woods, on a return date set by the Court, for an order *in limine* (1) imposing a shift of the burden of proof to Defendants on the issue of the hours worked and wages received while working for Defendants, in light of Defendants' failure to keep and/or otherwise maintain documents required by law that would enable the Court to determine damages with complete accuracy; (2) holding that Defendants' admissions in its Answer are binding, together with such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
September 3, 2019

By: VIRGINIA & AMBINDER, LLP  
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